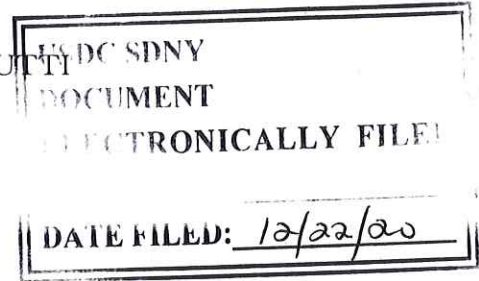LAW OFFICE OF ANTHONY CECUTTI
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December 21, 2020

MEMO ENDORSED

BY ECF
The Honorable Kimba M. Wood
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Abreu Gil et al; 20 Cr. 199 (KMW)

Dear Judge Wood:

I represent Nelson Diaz (Abdul Alamin) in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A on February 14, 2020. I write, without objection from the Government, and at the request of Pretrial Services, to respectfully request a modification of Mr. Alamin's bail conditions. Specifically, we request that on December 29, 2020, the location monitoring (GPS) condition be lifted.

As the Court is aware, Mr. Alamin suffers from a variety of medical conditions. He has several medical appointments scheduled each month. On December 29, 2020, Mr. Alamin has an MRI scheduled at 9:00 a.m. for his leg. To perform the MRI, his ankle bracelet must be removed. After conferring with Pretrial Services Officer Erin Cunningham, on December 29, 2020, Mr. Alamin will travel from his residence to the clinic where the MRI will be performed. At the clinic, his ankle bracelet will be removed by staff and be retained by Mr. Alamin. Following the MRI, Mr. Alamin will travel directly to the courthouse to have the ankle bracelet put back on.

Accordingly, we respectfully request that the Court modify Mr. Alamin's bail conditions, lifting the condition of location monitoring (GPS) for one day, December 29, 2020, so that he may be able to have an MRI performed on his leg.] Granted

Thank you for your consideration.

SO ORDERED: N.Y., N.Y. 12/22/20

Kimba m. Wood
KIMBA M. WOOD
U.S.D.J.